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Attorneys for Plaintiff and the Class

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

JEANNE MATTHEWS, individually
and on behalf of all others similarly
situated,

Plaintiff,

v.

MORTON & BASSETT SPICES,

Defendant.

Case No.: 3:22-cv-00497-JD

**JOINT STIPULATION TO
EXTEND PLAINTIFF'S TIME TO
FILE AMENDED COMPLAINT**

The Hon. James Donato

Trial Date: None Set

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Jeanne Matthews ("Plaintiff") and Defendant Morton & Bassett Spices ("Defendant"), through their respective attorneys, stipulate and declare as follows:

WHEREAS, Plaintiff filed their Complaint on January 25, 2022.

WHEREAS, Defendant filed their Motion to Dismiss Plaintiff's complaint on March 18, 2022.

1 WHEREAS, Plaintiff intends to amend her Complaint in lieu of a response to
2 the Motion to Dismiss;

3 WHEREAS, Fed. R. Civ. P. 15(a) gives Plaintiff a right to amend her Complaint
4 within twenty-one (21) days of service of Defendant's Motion to Dismiss.
5

6 WHEREAS, Plaintiff's deadline to amend her complaint is April 29, 2022.
7

8 WHEREAS, the Parties have engaged in preliminary settlement discussions;
9

10 WHEREAS, the Parties seek to continue these settlement discussions in an
11 effort to resolve this dispute and potentially avoid protracted litigation;

12 WHEREAS, this is the second extension sought by the Parties for the filing of
13 an amended complaint, but the third extension requested altogether
14

15 WHEREAS, the Parties seek an additional thirty-one (31) days for Plaintiff to
16 file her amended complaint.
17

18 IT IS THEREFORE STIPULATED AND AGREED by and among the parties
19 in the above-captioned matter that:
20

21 1. The deadline for Plaintiff to file her Amended Complaint will be May 30,
22 2022.

23 AGREED AND CONSENTED TO:
24

25 Dated: April 21, 2022

SHUB LAW FIRM LLC

/s/ Jonathan Shub

Jonathan Shub (SBN 237708)

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6
7 Dated: April 21, 2022

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Attorneys for Defendant
Morton & Bassett Spices

ATTESTATION

I, Jonathan Shub, am the ECF user whose ID and password are being used to file this document. In compliance with Local Rule 5-1(i)(3), I attest that concurrence in the filing of the document has been obtained from each of the other signatories.

Dated: April 21, 2022

/s/ Jonathan Shub
Jonathan Shub

[PROPOSED] ORDER

Pursuant to the parties' Stipulation, and good cause appearing, IT IS HEREBY
ORDERED that:

(1) The deadline for Plaintiff to amend her complaint is extended by thirty-one
(31) days, from April 29, 2022 to May 30, 2022.

IT IS SO ORDERED.

Dated: _____, 2022

Hon. James Donato
United States District Judge